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September 1, 2005

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**Re: Liberty Cablevision of Puerto Rico, Ltd. ("Liberty Cablevision")  
August 11, 2005 Subscriber Notification Report  
WC Docket No. 05-196**

Dear Ms. Dortch:

We write on behalf of Liberty Cablevision in response to the Enforcement Bureau's June 26, 2005 Public Notice in this docket. This Report summarizes Liberty Cablevision's compliance with the customer notification requirements of 47 CFR § 9.5.<sup>1</sup> We also provide some background information on Liberty Cablevision and its voice service, Liberty Voice Links ("LVL"). Liberty Cablevision's LVL service differs significantly from typical VoIP services, and provides more robust E911 services.

**Liberty Cablevision and Its Voice Services**

Liberty Cablevision is one of three cable companies operating on the island of Puerto Rico. Liberty Cablevision provides its subscribers with advanced services including digital cable, high-speed Internet, and VoIP services.

Liberty Cablevision provides its LVL service over its cable plant. Customers are not required to subscribe to Internet services to receive the LVL service. Liberty Cablevision uses Net2Phone's services – including Net2Phone's E911 services – for its LVL product. LVL is configured as follows:

**The Multimedia Terminal Adaptor ("MTA").** A Liberty Cablevision technician installs an MTA at the customer's premises, which is connected to the customer's inside wiring. Liberty Cablevision offers its subscribers a backup battery that provides up to 4 hours of backup power for the MTA in the event of a power outage.

**The traffic.** The subscriber originates a call over a traditional telephone. The call goes as analog traffic to Liberty Cablevision's MTA, which converts the call to IP. The IP traffic travels over Liberty Cablevision's cable plant to a Net2Phone gateway, where it is

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<sup>1</sup> Liberty Cablevision is submitting a Motion to Accept Late-Filed Subscriber Notification Report concurrently with this report.

reconverted to analog traffic and sent over the PSTN. The call never traverses the Internet.

**PSAP and Subscriber Location Information.** The Net2Phone E911 service provided with Liberty Cablevision's LVL product is virtually identical to traditional E911 service. Net2Phone has trunking to the PSAP for E911 services. Liberty Cablevision provides the same subscriber information to the PSAP as any traditional voice service provider. Further, LVL is not a nomadic VoIP service – it is designed and marketed as a fixed, at-home service. Liberty Cablevision's MTA will not function if moved to another address. Accordingly, Liberty Cablevision's subscriber location information is as reliable as with traditional E911 services.

### **Liberty Cablevision's Subscriber Notification Report**

Below, we provide information on Liberty Cablevision's customer notification and acknowledgement status.

**Advisories of circumstances when E911 service may not be available.** At the time of installation, Liberty Cablevision provides its customers with a written advisory that warns customers of the circumstances under which its E911 services may not be available, or may be limited in comparison to traditional E911 service.<sup>2</sup> In addition, Liberty Cablevision will soon mail a second advisory with its warning stickers and acknowledgment forms.

**Percent of subscribers from whom Liberty Cablevision has obtained acknowledgements.** Liberty Cablevision is in the process of having acknowledgement forms and return envelopes printed to send to its subscribers. The forms will be sent with a second advisory and with warning stickers for the subscribers to place on or near their CPE. Liberty Cablevision expects to receive executed acknowledgments from the majority of its subscribers within 30 days of mailing the acknowledgment forms.

**Distribution of warning stickers.** Liberty Cablevision has contracted with a vendor to print warning stickers for its CPE, and is awaiting delivery of the stickers. The stickers will be sent with instructions to the subscriber to place the stickers on or near

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<sup>2</sup> The English translation of the advisory reads:

As with your traditional telephone service, you can make emergency 911 calls using Liberty Voice Links cable telephone service. In an emergency situation, you may dial 9-1-1 on your Cable Telephone and you will be connected to the same emergency management system that your current telephone service uses. However, your Cable Telephone is connected to a cable modem, which requires electricity in order to operate. During a power outage, your cable modem will not operate, which means that your Liberty Voice Links telephone service will not be available. In such a situation, you will need an alternate means to communicate (for example, a cellular phone) in order to contact the emergency services professionals.

the subscriber's CPE. The stickers will warn subscribers that their E911 service will not function during a power outage.

**Percent of subscribers not provided with advisories or warning stickers.**

As of the date of this report, Liberty Cablevision has provided all its customers with written advisories. It has not yet provided its subscribers with warning stickers because its vendor has not yet completed printing the stickers.

**Liberty Cablevision's planned actions toward customers who do not affirmatively acknowledge having received and understood the advisory.** Liberty Cablevision's fixed LVL product provides subscribers with a robust E911 service that includes reliable customer location information. Further, Liberty Cablevision has already warned its customers of the limitations on its VoIP services during a power outage, and will be sending out acknowledgment forms shortly. In light of these compliance efforts, Liberty Cablevision believes that it would be of greater detriment to public safety to disconnect these subscribers than to leave their E911 services connected while Liberty Cablevision continues its efforts to obtain acknowledgements.

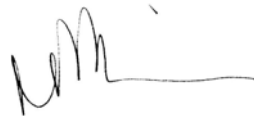
**Recordkeeping.** Liberty Cablevision will maintain its customers' acknowledgements at its office located at Luquillo Industrial Park, Road 992, Km 0.2, Luquillo, P.R. 00773-0719.

**E911 compliance personnel contact information.** Liberty Cablevision's E911 compliance contact is:

Name: John Conrad  
Title: Regulatory Compliance Manager  
Address: P.O. Box 140759, Arecibo, P.R. 00614  
Phone: (787) 444-0219  
Email: [jconrad@libertypr.com](mailto:jconrad@libertypr.com)

If you have any further questions, please contact me.

Regards,



Nicole Paolini-Subramanya  
Attorney for Liberty Cablevision of  
Puerto Rico, Ltd.